

David S. Rosenzweig, Esq.
John K. Habib, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street, Sixth Floor
Boston, MA 02110-3113

January 5, 2005

BY FAX AND U.S. MAIL

RE: Petition of the City of Cambridge, D.T.E. 04-65

Dear Mr. Rosenzweig and Mr. Habib:

Enclosed please find the Department's second set of information requests on the above-captioned matter. Responses should be filed on or before January 11, 2005. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
John Shortsleeve, Esq.

Encl.

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
CAMBRIDGE ELECTRIC LIGHT COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Cambridge Electric Light Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Cambridge Electric Light Company in this proceeding.

1. "CELC" or "Company" means Cambridge Electric Light Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents CELC filed in this proceeding.
3. "Cambridge" or "City" means the City of Cambridge.
4. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
5. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
6. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
7. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which

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information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

9. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
10. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Mark Barrett, Rates and Revenue Requirements Division; (3) James Byrnes, Rates and Revenue Requirements Division; and (4) Sean Hanley, Rates and Revenue Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
CAMBRIDGE ELECTRIC LIGHT COMPANY**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Cambridge Electric Light Company the following information requests.

- DTE 2-1 Refer to Exh. NSTAR-1; IR-DTE-1-10; and the Company's response to IR-City-1-13, Att. City-1-13(a) at 3, and Att. City 1-13(b) at 3. Incorporating the data the Company provided in exh. NSTAR-1 for accounts 632, 633, 634, and 635, please provide individual schedules for each of these accounts in the identical format (and columns) as prescribed in IR-DTE-1-10. If necessary, the Company may include additional data with a detailed explanation as to how it derived this data. Provide complete and detailed documentation to support your response.
- DTE 2-2 Refer to the Company's response to IR-CITY-1-29, at 2. The Company states that "[t]he use of Iowa Curves is only for the purpose of associating the total streetlight accumulated depreciation with the vintage years." Explain the method the Company employs in using Iowa Curves to associate total streetlight accumulated depreciation with the vintage years. Provide complete and detailed documentation to support your response.
- DTE 2-3 Refer to Exh. NSTAR-1, at 1, column D, row 1. Provide the calculations that resulted in the amount of \$134.68. Provide complete and detailed documentation to support your response.
- DTE 2-4 Refer to the Company's response to IR-DTE-1-11, at 2. Explain the Company's statement, "[o]nly the rate of recognition of depreciation going forward is changed." Provide complete and detailed documentation to support your response.
- DTE 2-5 Refer to the Company response to IR-DTE-1-11, at 2 of 3. The Company stated that, "[t]his is what we refer to as the 'convention for spreading remaining book value of the plant over the expected remaining average service life.'" Explain this "convention" and provide the source for the Company's quote.
- DTE 2-6 Refer to the Company's response to IR-DTE-1-5, att. DTE-1-5, at 1. Regarding the retirements amount of (\$33,293.01), provide the types of plant that were retired, and the number of each type of plant that was retired including original cost, vintage year and salvage amount of all retired plant. Include complete and detailed documentation to support your response.

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- DTE 2-7 Refer to the Company response IR- DTE-1-5, Att. DTE-1-5, at 1. Regarding the Cost of Removal amount of (\$15,618.50), explain all costs that were included in this figure and provide documentation for said costs. Include complete and detailed documentation to support your response.
- DTE 2-8 Refer to the Company response to IR-CITY-1-9, at 2. Explain how the Company calculates the “Salvage value of plant retired.” Provide complete and detailed documentation to support your response.
- DTE 2-9 Refer to the Company response to IR-CITY-1-9, at 2. Explain how the Company calculates the “Cost of Removal related to retired plant.” Include with your response the actual amount, and calculation of the amount used in the algebraic expression used to determine the Company’s accumulated depreciation.